

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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GATEGUARD, INC.

Plaintiff,

Civil Action No. 21-cv-9321 (JGK)

v.

FIRST-SECOND AMENDED AND
CLASS ACTION COMPLAINT

AMAZON.COM, INC.,
AMAZON.COM SERVICES, INC.,
AMAZON.COM SERVICES, LLC,
AMAZON LOGISTICS, INC.
RING, LLC

JURY TRIAL DEMANDED

Defendants.

Plaintiff GateGuard, Inc. ("GateGuard" or the "Company") by and through its attorneys, Quanton Law, PLLC, for itself and on behalf of all others similarly situated, as and for its Complaint against Defendants Amazon.com, Inc., Amazon.com Services, Inc., Amazon.com Services, LLC, and Amazon Logistics, Inc. (collectively, "Amazon") and Ring, LLC (collectively, with Amazon, the or "Defendants"), alleges and states as follows:

INTRODUCTION

1. This is an individual and class action for damages, documented with photographic and video evidence, resulting from Amazon's illegal pattern of tampering with intercom and access control devices in multifamily residential buildings in New York and across the nation, while lying to or deceiving low-level building personnel and deceiving property owners about its authority to install its own access devices to gain access to buildings without the owners' knowledge or consent and install its supposedly "free" door opening device – the Amazon "Key for Business – that comes with the hidden costs of damage to other parties' property. To gain access illegally to residential buildings, Amazon either directly or

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through intermediaries forges names onto contractual documents, lies orally to low-level employees, allows superintendents at an individual property to “authorize” the installation of the Key for Business on a portfolio-wide basis, enters phony contact information, such as make-believe email addresses, pretends to have authorization it does not have, and even dispenses with any written documentation of any kind in its haste to get its product installed in the classic “break doors first-explain afterwards” strategy of parties seeking to grow market share without regard to legal niceties.

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2. As a result of these practices, GateGuard and individual property owners frequently have no idea that the Key for Business is installed at GateGuard buildings, and when the intercom ceases functioning because of a Key for Business-related problem – such as a short-circuit of the intercom because of the installation of the Key for Business or the excess power load created by the installation of the Key for Business – GateGuard suffers the loss of customers and access to customers’ portfolios of properties, lost opportunities to generate maintenance revenue and market add-on services, lost intangible benefits such as free advertising, and the loss of goodwill and reputational damage, and property owners suffer damage to their amplifiers, magnetic door strikes and other property.

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4. In addition, Amazon has also posed as a GateGuard client through one of its so-called “channel partners” – the entities that operate at Amazon’s direction to strong arm potential clients into accepting the installation of a competing device, the Amazon Key for Business, or “Amazon Key” – so as to study the features of the GateGuard device at its top secret research laboratory and has also interfered with GateGuard’s contractual relations and prospective economic advantage, committed computer fraud, misappropriated trade secrets, converted

property to its own use, and unjustly enriched itself—all as part of a broader scheme that attempts
to monopolize

3. the e-commerce delivery market. GateGuard is also seeking an injunction permanently enjoining Amazon from taking any further action to tamper with any intercom devices installed in multifamily residential buildings in New York without the consent of the device owner and the building owner/manager or to engage in any further pattern of surreptitious installation of its key device without the property owner's knowledge and consent.

2-4. Founded in 2016, GateGuard is a startup company that develops, manufactures and sells security technology for multi-tenant apartment buildings.

3-5. One of GateGuard's primary offerings is its "AI Doorman" intercom device, which was first released in 2016.

4-6. GateGuard's intercoms offer unique features and capabilities that enable building managers to autonomously track everyone who enters, buzzes, or uses a guest code. These features alert building managers to forbidden activities such as illegal subletting, use of residential apartments as dormitories, unauthorized or non-compliant group activities and other threats to the safety and property of residents and landlords alike.

7. GateGuard's intercoms also generate real-time logs of these activities managers can view, filter, and print from any mobile phone, tablet, or computer, which are accessible via built-in cellular modems that connect the units to the Internet. GateGuard thus constitutes a valuable repository of client data of great interest to a business such as Amazon.

8. Moreover, because Amazon obtained access to a physical device designed to be marketed to a property manager (which Amazon falsely pretended to be through its channel partner acting at its direction), Amazon software engineers could get access to the design, components, processing, communications, messaging, performance - in physical, functional, and logical realms - of the GateGuard system by studying the GateGuard device at an ultra-secret research and development

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lab, on the flimsy pretext that it was appropriating the GateGuard device, in violation of the GateGuard contract its channel partner accepted, for "trouble-shooting purposes." Obviously, had Amazon truly been interested in "trouble shooting" they would have been honest and cooperative with GateGuard, which they were not.

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9. The GateGuard system as a whole includes an intercom, mobile app, web-based online platform, servers, communications devices, and operational data, all of which were uniquely designed to provide an access control solution used by tenants/visitors, property owners/managers, and delivery services.

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10. Once Amazon caused the GateGuard device to be acquired by one of its channel partners, GateGuard activated the device. This meant that, when the device was sent to Amazon's secret laboratory, Amazon could observe how a connected device operates through its access to an activated device and could thus analyze the mechanisms by which the GateGuard mobile app conducts video conversations and unlocks doors. Amazon's software engineers could gain access to the GateGuard panel and observe how the panels and control system send a log of every entry attempt to GateGuard server technology on the cloud and could observe the functioning of this server technology itself.

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11. GateGuard keeps the functioning of its system completely secret and only a highly developed research lab, such as the one at which the GateGuard device was analyzed, examined and ultimately copied, would have the tools and experience to gain access.

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<https://www.linkedin.com/in/kaushik-mani-970b57b/>.

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One of the people who identifies himself as the "lead inventor" of the Key for Business, Mr. Kaushik Mani, has publicly posted a video of the functioning of the Ring Intercom that incorporates elements of the GateGuard system. <https://www.linkedin.com/feed/update/urn:li:activity:7084171069107941376/>.

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5. _____


6.13. Property managers and tenants rely on GateGuard to keep their buildings safe.

7.14. GateGuard offers its devices and associated software on a subscription model based on a Service Agreement, pursuant to which GateGuard offers to install its intercom at a low upfront cost with recurring fees based on usage over a multiple-year period. GateGuard's Service Agreement is available at www.gateguard.xyz. The only way for customers to subscribe for GateGuard's products and services is through the www.gateguard.xyz website and the execution

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of the Company's Service Agreement.

15. In fact, after having examined the GateGuard system as a whole, Amazon is now rolling out a directly competing service through the Amazon Key. Amazon has announced to its channel partners the introduction of a new service based on its theft of GateGuard proprietary trade secrets:

2	Announcing the Launch of Property Management Portal for Property Managers	<p>We are introducing a new web-based portal for property managers to manage third-party provider access with the release of the single signature install agreement. Once the property manager signs the install agreement and installation is completed at one of their properties, they will receive an email invitation containing the link to the property management portal within 1 month.</p> <p>Sales reps will also be provided with a test account to demonstrate the portal's functionality to interested property managers.</p> <p>Please refer to the following steps for more information.</p>	
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16. The above service closely parallels GateGuard's "Property Panel," the advantages of which GateGuard's founder, Ari Teman, specifically pitched to Amazon in October 2020.

See ¶¶ 135-140s *infra*.

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17. In addition, Amazon's subsidiary Ring rolled out a new video to phone message service, almost a carbon copy of the same, pre-existing GateGuard feature, in 2022.

See paragraph 10 above.

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18. To place an order, a customer is required to confirm that it has read and agrees to the e-Service Agreement and the related Terms and Conditions, which make clear, *inter alia*, that GateGuard is the owner of its devices. The relative rights and obligations of the Company and its subscribers are set forth in more detail in the section entitled, "The GateGuard Service Agreement and Terms and Conditions" below.

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19. Amazon is not only destroying GateGuard's business by the conduct described above: It is compromising the safety of New York City residents – and *breaking the law*.

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20. Specifically, N.Y. Multiple Dwelling Law § 50-a requires every apartment building in New York State be equipped with a working intercom system. The statute imposes *criminal* liability on anyone "who shall willfully destroy, damage, or jam or otherwise interfere with the proper operation of" such intercoms.

21. This is exactly what Amazon has done. At numerous buildings throughout New York City and in this District, Amazon installed its own devices without permission of building management and has destroyed, damaged, and interfered with the proper operation of GateGuard's intercoms either making the devices appear to be defective, or actually damaging the proper functioning of GateGuard's devices in order to return to the building and propose a security "upgrade" to unsuspecting property managers and owners who did not know of Amazon's initial installation.

22. Amazon has operated in a ruthless, cut-throat manner, pushing growth at all costs and signing up new buildings at breakneck speed, often without consent and by deceiving building

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superintendents that they have obtained management or ownership approval.

~~+2.23.~~ GateGuard has brought this issue to Amazon's attention repeatedly, even directly to its founder Jeff Bezos, starting in October 2020.

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24. Yet Amazon refuses to take responsibility for its conduct or even to change its deceptive and unlawful practices, despite being on notice that its activities compromise the safety of building residents—including *Amazon's own customers*.

25. Moreover, GateGuard has now learned, as described above, that Amazon instructed its channel partner to pose as a GateGuard client and then subjected the GateGuard device and system as a whole to analysis at its top-secret research and development laboratory for purposes

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26. Left with no other choice, GateGuard brings this suit to hold Amazon accountable for the damage it has caused, and to ensure that Amazon does not improperly profit from the proprietary technology it has accessed through its illegal conduct, and to prevent Amazon from monopolizing the e-commerce delivery market and further damaging GateGuard and other victims of its anti-competitive conduct.

THE PARTIES

27. GateGuard, Inc. ("GateGuard" or "Plaintiff") is a Delaware corporation having a principal place of business at 1521 Alton Road, #888, Miami Beach, FL 331391. "GateGuard" is also Plaintiff's registered trademark.

28. Defendant Amazon.com, Inc. is a Delaware corporation having a principal place of business at 410 Terry Avenue North, Seattle, WA 98109.

29. Defendant Amazon.com Services, Inc., is a Delaware corporation having a principal place of business at 410 Terry Avenue North, Seattle, WA 98109.

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~~18,30.~~ Defendant Amazon.com Services, LLC, is a Delaware limited liability company having a principal place of business at 410 Terry Avenue North, Seattle, WA 98109.

~~31.~~ Defendant Amazon Logistics, Inc. is a Washington State corporation having a principal place of business at 410 Terry Avenue North, Seattle, WA 98109.

~~19,32.~~ Defendant Ring LLC is limited liability company with its corporate headquarters at 1523 26th Street Santa Monica, CA 90404 United States. Key for Business is a division of Ring and many of the Key for Business developers, including the “lead inventor” of the Key for Business, Kaushik Mani work for Ring on the development and introduction of Amazon’s new Ring Intercom.

~~20,33.~~ Upon information and belief, Defendants are and were at all relevant times the agents, affiliates, alter egos, partners, assignees, successors-in-interest, or principals of each other or were otherwise responsible for or participated in the performance of the wrongful acts alleged

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herein, and thereby are jointly and severally responsible for such acts and incurred liability therefore.

JURISDICTION AND VENUE

~~21-34.~~ This court has subject matter jurisdiction over this action under 28 U.S.C. §§ 1331 and 1338 in that this case arises under various federal statutes, including the Computer Fraud and Abuse Act, 18 U.S.C. § 1030 *et seq.*, the Defend Trade Secrets Act of 2016, 18 U.S.C.A. § 1832 *et seq.*, the Lanham Act, 15 U.S.C. § 1125, the Sherman Antitrust Act of 1890, 15 USC § 2, and the Clayton Act of 1914, 15 U.S.C. § 12 *et seq.*

~~22-35.~~ This Court has supplemental jurisdiction over all state law causes of action asserted herein pursuant to 28 U.S.C. § 1367, because Plaintiff's state law claims are part of the same case or controversy.

~~23-36.~~ This Court has personal jurisdiction over Defendants because each of them conducts business in New York and because they have committed torts in the State of New York and in this district.

~~24-37.~~ Venue is proper in this Court pursuant to 28 U.S.C. § 1391(b), as a substantial part of the events, acts, omissions, and injuries giving rise to the claims occurred in this judicial district and because Defendants are subject to personal jurisdiction in this judicial district at the time this action has commenced.

FACTUAL BACKGROUND

General

~~25-38.~~ Amazon has achieved market power in multiple segments of the Internet-based economy. After beginning as a lowly online bookstore, Amazon now controls 40% of the cloud

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storage market, 34% of the cloud hosting market, 33% of the cloud infrastructure services market, more than Microsoft, Google, IBM and Alibaba combined.¹

26.39. Amazon's complete dominance of the overall e-commerce market is even more striking, as the chart below illustrates. Amazon has the power to dominate markets and is acting in an increasingly cutthroat manner that has attracted the attention of the Federal Trade Commission²



27.40. According to a recent report of the House of Representatives' Subcommittee on Antitrust, Commercial and Administrative Law, entitled Investigation of Digital Competition Markets (the "House Antitrust Report"), Amazon controls about 65% to 70% of all U.S. online marketplace sales and is the most-visited website in the world for e-commerce and shopping. In a telling phrase, the House Antitrust Report defines Amazon as the "gatekeeper" for e-commerce, because third parties are virtually compelled to use the Amazon platform for e-commerce sales.

28.41. Amazon's most ambitious plan yet is to become the actual, and not merely metaphorical, gatekeeper for urban multi-family residences.

¹ See <https://kinsta.com/aws-market-share>.

²<https://www.supplychainbrain.com/articles/30346-walmart-subsidizing-some-vendors-in-price-war-with-amazon> (Amazon has also come under scrutiny for increasingly leaning on vendors to ensure that their products are not offered for a lower price on Walmart.com or any other rival website).

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29. —Amazon's goal is nothing less than the monopolization of the e-commerce delivery market and domination of nation-wide package delivery, giving its own products a competitive advantage over rivals and forcing e-commerce delivery services (from Shipstation.com to Walmart.com), package delivery services (such as Ship Bob, Fed Ex and UPS), and package delivery management services such as GateGuard either out of business or to become customers of the Amazon network.

Amazon Logistics

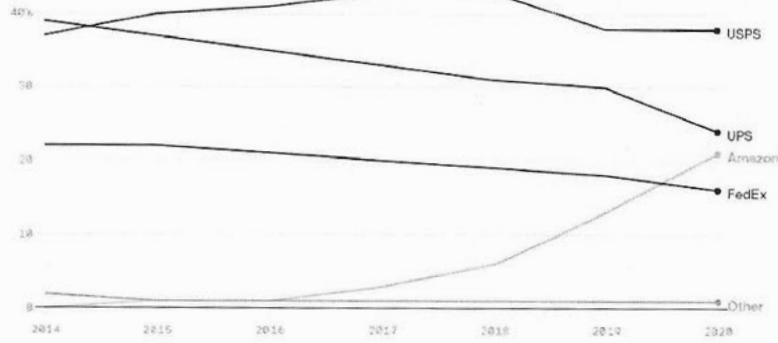
30-42. Amazon's deliveries are effected through Amazon Logistics Inc., an Amazon subsidiary founded in 2016. In just a few short years, Amazon Logistics now controls over 20% of the **total package shipping market in the United States** and shows no sign of slowing down. Amazon Logistics' tremendous growth has vaulted it ahead of Federal Express, one of the industry leaders with decades more experience than Amazon logistics.³ The charts below testify to the explosive growth of Amazon Logistics.

³<https://www.asicentral.com/news/newsletters/promogram/october-2021/report-amazon-surpasses-fedex-in-us-shipping-share/>

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Market share of U.S. parcel volume

2014 to 2020

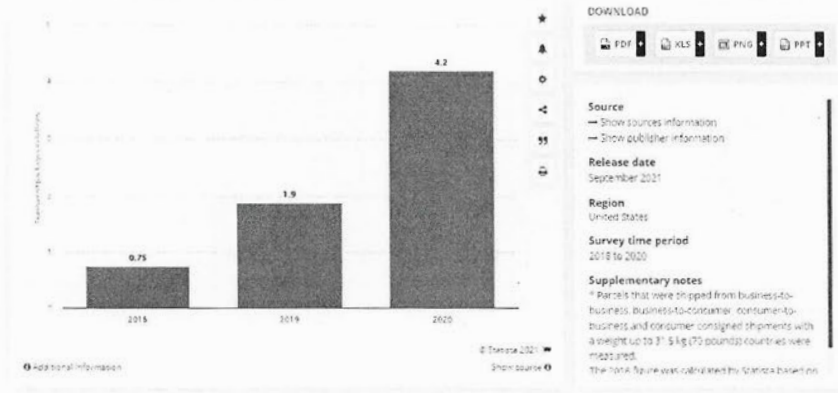


Reproduced from Supply Chain Dive; Chart: Axios Visuals

4

Transportation & Logistics | Logistics

Number of packages delivered by Amazon Logistics in the United States from 2018 to 2020 (in billion packages)*



⁴<https://www.asicentral.com/news/newsletters/promogram/october-2021/report-amazon-surpasses-fedex-in-us-shipping-share/>

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According to Axios, “Amazon has the potential to decimate UPS and Fed Ex.”⁵ Amazon's online platform is already undercutting the big players' average shipping rates by up to 33%, according to Freightwaves. As Axios puts it, Amazon’s “tactic is a modern example of putting competition through a Rockefeller-style ‘good sweating.’”⁶

32. Amazon already uses its market power to tie third party sellers on its “Amazon marketplace” platform to its fulfillment and delivery business. As the House Antitrust report puts it,

Due to a lack of alternatives, third-party sellers have no choice but to purchase fulfillment services from Amazon. More than 73% of all Marketplace sellers worldwide reportedly rely on FBA services. Numerous third-party sellers told the Subcommittee that they feel they have no choice but to pay for FBA to maintain a favorable search result position, to reach Amazon’s more than 112 million Prime members, and to win the Buy Box—through which the vast majority of Amazon sales are made. A recent consumer survey indicated that 75% of Amazon Prime customers specifically search for products flagged as Prime-eligible. As a result, as the Online Merchant’s Guild told Subcommittee staff, many sellers will “say that without Prime you are dead.” A competing online marketplace described how Amazon effectively forcing sellers into its FBA program makes it more difficult to compete with Amazon for sellers, stating, “[T]hrough anticompetitive strategies and practices by Amazon, many . . . sellers are being pulled into Amazon’s tied marketplace-and-e-commerce-fulfilment ecosystem in a manner that makes them not only less independent but directly dependent on Amazon.

The Last-Mile Delivery Market

33. In 2016, the year Amazon Logistics was created, industry analyst Mordor Intelligence noted:

The last mile delivery, being a final leg of logistics is very important, time consuming and also takes a major share in the overall delivery cost. Unlike the normal shipping, where large amount of cargo is transported along a fixed route, the last mile delivery

⁵ <https://www.axios.com/amazon-shipping-bigger-than-fedex-3dc5d80d-e16a-4531-9f45-1898a6261a78.html>

⁶ *Id.*

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involves transportation of goods in multiple routes with low parcel sizes. This cost has been vital for the retailers as the customers' expectations toward the fast and free delivery are growing. So, the companies and retailers are looking at advanced technological solutions and new delivery models to improve the overall process. According to various industrial estimates, the costs associated with the last miles stands around 50% of the overall logistics cost.

34. Historically, the private package delivery duopoly, UPS and Fed Ex, outsourced last-mile delivery to the US Postal Service ("USPS").⁷ However, Amazon led the way in internalizing the last-mile delivery function, leading UPS and Fed Ex to follow suit.

35. E-commerce is the major driver of last-mile delivery growth. According to the US census, e-commerce sales for the second quarter of 2021, adjusted for seasonal variation, but not for price changes, was \$222.5 billion. Unlike bricks and mortar retail sales, 100% of all e-commerce sales require last mile logistics delivery. While Amazon's share of total last mile delivery is not publicly available, if its share of the much larger national parcel delivery market has now surpassed Fed Ex and, likely, UPS, its last mile delivery market share must be even greater.

The E-commerce Delivery Market.

36. The total national e-commerce market was estimated at \$767 billion in 2021.⁸ The GDP of the New York Metro area was approximately \$1.5 trillion before the onset of the Covid-19 pandemic⁹ out of an approximately \$21.5 trillion United States pre-pandemic GDP.¹⁰ The New York metro area thus constitutes approximately 7% of US GDP and the New York e-

⁷ <https://www.savethepostoffice.com/postal-service-delivers-last-mile-almost-changing-modes-delivery/#:~:text=The%20Postal%20Service%20helps%20out%20FedEx%20and%20UPS,it%20does%20best%20%E2%80%9D%20%E2%80%94%20last%20mile%20delivery.>

⁸ <https://www.statista.com/statistics/272391/us-retail-e-commerce-sales-forecast/>

⁹ <https://www.statista.com/statistics/183815/gdp-of-the-new-york-metro-area/>

¹⁰ <https://tradingeconomics.com/united-states/gdp>

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commerce market can be estimated at \$53 billion. Monopolization of the e-commerce delivery market can be expected to increase Amazon's e-commerce market share 10% or more.

37. The e-commerce delivery market is booming.¹¹ The global e-commerce logistics market is estimated to generate \$535 billion in annual revenues.¹² The US share of this market can be estimated at approximately \$100 billion, of which approximately 60% is in transportation/delivery. *Id.* The size of the New York e-commerce delivery market can thus be estimated to be approximately \$4 billion. While Amazon's immediate goal is to dominate e-commerce delivery so as to increase e-commerce retail sales, the harm to competitors can be measured as a contraction of the market share for Amazon's competitors, and either the disappearance of competitors or the conversion of competitors to clients.

38. Amazon already has market power in retail e-commerce, as the House Antitrust Report recognizes. Likewise, Amazon has market power over fulfillment logistics for third-party sellers who sell through the Amazon marketplace, as reflected in the 73% fulfillment rate for third party sales on the Amazon platform. If Amazon controls 70% of the online marketplace (with its own sales aggregated with third party sales) and its own sales amount to 50% of all online sales, this means that it must control in excess of 60% of all e-commerce deliveries.

39. ~~Here, Amazon has the market power to achieve its ultimate goal—the monopolization of the e-commerce delivery market and the achievement of a dominant position in package delivery generally.~~

¹¹ <https://manometcurrent.com/e-commerce-in-parcel-delivery-market-is-booming-worldwide-with-iso-deutsche-post-fedex/>

¹² <https://www.alliedmarketresearch.com/e-commerce-logistics-market>

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40-39. Control of the ecommerce delivery market will feed back into and further reinforce Amazon's domination of the e-commerce market and position it to destroy other competitors as well or turn them into clients.

Residential Apartments and the Amazon "Key" to Control

41-40. In large urban environments, the vast majority of the population lives in multi-family apartments. In New York City, for example, 84% of the housing stock is in multi-family apartment buildings. <https://furmancenter.org/thestoop/entry/report-growth-in-nycs-housing-stock-is-outpaced-by-growth-in-adult-populati>.

42-41. All apartment buildings are required by law to have an intercom or access control system of some kind, and the intercom market in New York alone consists of hundreds of different companies. Just a few of these companies include Computer Integrated Services of New York, Advanced iCam New York, Intercom in NYC, Hillman Intercom, CBSIntercom Systems, Johnson Integrated Security Systems, United Security Systems, Easy Intercom, Parker Intercom Service and Brooklyn Intercom. Control of access to residential multi-family dwellings is the key to domination of the delivery market.

43-42. Amazon's strategy is not to displace all competitors in the access control market entirely—at least not immediately. Rather, its short-term aim is to position itself strategically in the access control space so as to monopolize the lucrative delivery market. In the longer term, on information and belief, Amazon also aims to use GateGuard's proprietary technology to develop a "smart" intercom of its own, displacing not only GateGuard entirely, but taking share from Google's Nest product.

44-43. In this e-commerce delivery market, Amazon's competitors are various entities of different types that provide package delivery services, and include the following:

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- Third party-logistic (“3PL”) providers such as Ship Bob and other fulfillment centers;¹³
- Other package delivery companies – UPS, Fed Ex, USPS, DHL that deliver directly or that work with e-commerce retailers or 3PL providers;
- Other e-commerce retailers that integrate their own delivery solutions or work with other package delivery companies;
- Building access providers with package delivery management functions such as GateGuard;
- Certain landlords who seek to internalize control package delivery services, such as external storage, or partner with access providers such as GateGuard.

45-44. To gain a competitive advantage over all these competitors, in 2019, Amazon hit on the solution, which it calls the Amazon Key for Business, the “Key for Business” or “Key” for short.

46-45. The Key for Business is a small device that can be inserted into existing access devices or systems through an “extender” described in more detail below, or by being directly wired into an existing access system’s wiring. The Key can remotely controlled and, once installed, Amazon deliverers can use it to obtain building access 24/7 without the intervention of any third parties, landlords or owners or access control devices.

47-46. All of Amazon’s competitors in the e-commerce delivery market are threatened – and, as discussed below – damaged by the Amazon Key. The Key provides Amazon with a direct competitive edge over other package delivery services that do not have dedicated access to

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¹³ See <https://www.shipbob.com/>.

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apartment buildings and thus have a higher cost structure (failed deliveries, circling time); over fulfillment services that similarly suffer from a pricing and reliability disadvantage; over delivery management companies that can be undercut and driven out of business as Amazon controls a larger and larger share of the market; and over landlords, who can no longer offer off-site storage as an economical alternative to immediate Amazon delivery. In short, the Key aims to be an *essential facility*, through which a company that already controls 60-70% of the e-commerce delivery market can monopolize the market and, once competitors are driven out of business or turned into customers, raise prices on consumers with no alternative.

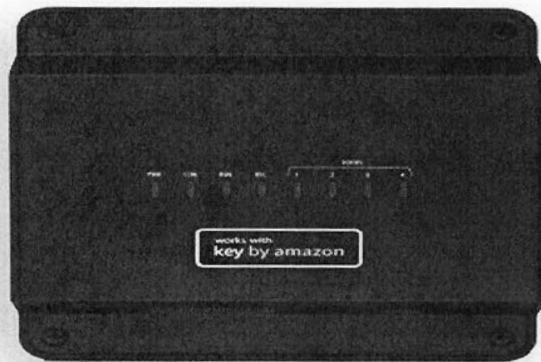
~~48-47. GateGuard is the quintessential competitor in the delivery market Amazon needs to neutralize or destroy: the independent package delivery management company. GateGuard makes clear to its customers and potential investors that package delivery management is central to its business proposition, and a core element of its long-term value, as set forth in Section 13 of its Service Agreement:~~

13. PACKAGE AND DELIVERY MANAGEMENT

1. The goal of this system is to remove the burden and liability of package management from the management company, building officers, and staff, and to remove risks associated with package management. As such, GateGuard will have control over all aspects of package delivery, from who can deliver into the system, to when, and what.
2. GateGuard may allow or disallow any delivery service, courier, or other organization or individual from accessing the service, or placing items into any package area. GateGuard may disallow any product or item into package area, such as but not limited to hazardous, oversized, or overweight items that may pose a risk to equipment and humans.
3. GateGuard may require any or all Services to deliver to Holding Locations. This is for logistical reasons, such as to avoid overload, or traffic, or annoying residents at peak times, or excessive burden on the system or financials of the system. GateGuard may charge services a fee for usage of holding services. (Services will be able to deny this charge if they choose to hold the package themselves and re-deliver it at an approved time or return the package to its source).

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49-48. The Amazon Key seeks to undermine and destroy GateGuard's separate package and delivery management services for Amazon products. The Key, pictured below, appears innocuous, but is in fact a competition killer.



50-49. The Amazon Key "brain" pictured above is wired directly into or onto the GateGuard circuitry, or the circuitry of other access control providers, often shorting the devices and/or their lock mechanisms due to polarity or voltage mismatches, as shown in more detail below. Critically, Amazon does not compete on the technological superiority of the Key device, which is a relatively "low-tech" and simple electronic "door key." Rather, to install its Key for Business, Amazon lies to building superintendents, claiming to have received authorization to